

Name of ALL People bringing THE Suit

PLAINTIFFS] LARRY DON LANGS

PO BX V. 12428-A TX,
STATE CAPITOL RM251 § PO BX 12548 AUSTIN
Governor. Greg Abbott. = Attorney. Ken PAXTON
TDCJ Director Stephen William. TDCJ POROLE
BROAD HEAD.

COMPLAINT

CIVIL ACTION NO

United States District Court
Southern District of Texas
FILED

MAY 10 2016

David J. Bradley, Clerk of Court

I JURISDICTION & VENUE [B]

1] This is a Civil action authorized by 42 USC. Section 1983 to Redress the Deprivations, under color of state law, of Right secured by the Constitution of the United States. The courts has jurisdiction under 28 USC, section 1331 and 1333 (A)(3). Plaintiff seeks declaratory relief pursuant to 28 USC, section 2201 and 2202. Plaintiff's claims for injunction relief are authorized by 28 USC, section 2283 & 2284 and Rule 65 of the ~~the~~ federal rules of Civil Procedure

2] The [name of District you are filing your suit in] is an appropriate venue under 28 USC, section 1331(b)(2) because it is where the events giving rise to this claim occurred - South District

3] Plaintiff [your full name] LARRY DON LANGS, is and was at all times mentioned herein a, prisoner of the state of [state] in the custody of the [state] Department of Corrections. He/she is currently confined in [Polunsky Unit] in, [City State] LIVINGSTON TEXAS

III DEFENDANTS [D]

4] Defendant [full name of head of corrections department] is the [Director/Commissioner] NAME. Stephen William. He is legally responsible for the overall operation of the Department and each institution under its jurisdiction, including, [NAME of prison where plaintiff is confined]. And due to this law suit, there are three more defendants. They are TEX Governor Greg Abbott, Attorney General. Ken Paxton. And TDCJ Porole Head. Broad ~~members~~

I feel their is no need for the warden they are power X is the

5] Defendant, [warden's full name] the warden they are power X is the [superintendent/warden] of [NAME of Prison. Polunsky unit.] He is legally responsible for the operation of, [NAME of Prison Polunsky unit] and for the welfare of all the inmates in that prison.

6] Defendant [Case 4:16-cv-01938 Document 1 Filed in TXSD on 05/10/16 Page 2 of 6] is A Correctional Officer of the [State] Department of Corrections who at All times mentioned in this Complaint, held the of [Position of guard] who very work for TDCJ that held any Postion ALLOWED Inmate to work as SLAVERY. was assigned to the Polunsk unit are in unit in [Texas].

7] each defendant issued individually And in his [or her] official, CAPACITY At all time mentioned in this complaint each defendant acted under color of State Law. Governor Greg Abbott. At the General Ken Paxton. TDCJ Director Stephen William Broad Head Person Porole - - - - - X In the amount of \$~~5,000~~ for each defendant. ~~5,000,000,000~~
[125,000,000]
[225,000,000]

8] state in Detail all the facts that are the basis for your suit. You will want to include what happen, where, when, how, and who was there. Remember that the Judge may know very little about PRISON. So be sure to explain the terms you use. Divide your description of the facts into separate short paragraphs in away that makes sense - by time date or event. [Answer to 8]. TEXAS Governor And TEXAS Attorney General will say. Due to a crime. one. committs. Give TEXAS. The Rights To Put A person in prison To have to work for Tex. as A Slave Labor. how ever in 1865 and before slave was freed. we all knows that SLAVERY was the norm during colonial time. And to sentence a person to prison And hard labor was also a norm. In thoes day most people did not get cases over turn. are even had a chance to do so. - - - - - IN over days to day Due to cases being over turn. NO one is A 100 percent guilty why. because of. The Willey Misconduct of over ~~partic~~ public service. Judge D.A. policeman and wemen lawyer.. And Prea Barraine which is un fair. - - - - - Also we know Tex does not have A LAW to work as with out some kind of conversation They have a Policy Not A Legal. LAW ON A LAW book.

9] you may want to include some facts that you do not know personally. It may be general prison knowledge OR it may be information given to you by people who are not plaintiff in your lawsuit. Its is OK. To include this kind of information, but you need to be sure that each time you give these kind of facts. You start the paragraph with the phrase, Upon information and belief. If you include such facts. You must have a good faith basis for believing them to be true.

- 10) You can refer to the document attached hereto for materials that you have attached at the back of your complaints. ~~Exhibit A~~ AS Exhibits in support of your complaint each document or group of documents should have its own letter exhibit A exhibit B etc;

11) ~~Plaintiff~~

EXHAUSTION OF LEGAL REMEDIES [F]

11) Plaintiff [Name] Larry Don Langs used the prisoner grievance procedure available at [Name of institution: Polunsky Unit] to try and solve the problem. ON [date filed grievance, 2-12-16] Plaintiff [Name Larry Don Langs] presented the facts relating to this complaint. ON [date got Response] Plaintiff [Name Larry Don Langs] was sent a response saying that the grievance had been denied.

ON [date filed appeal]. he/she appealed the denied of the grievance

V. LEGAL CLAIMS [G]

12)

Plaintiff Realleges and incorporate by reference Paragraphs-1-11 [OR however many paragraphs the first four section took]

13) The [State the violation, for example, beating, deliberate indifference to medical need, unsafe condition, sexual discrimination]. Violated Plaintiff [Name of Plaintiff- Larry Don Langs]s Rights And ~~constituted~~ constituted [State the Constitutional Right at issue, for example cruel and unusual punishment & due process violation] under the [State the number of the constitutional Amendment at issue, like eight are fourteenth] Amendment to the United States CONSTITUTION, article 30] State nothing in the Declaration may be interpreted as implying for any state, group or person any right to engage in any activity or to perform any act aimed at the destruction of any of the rights and freedoms set forth herein] To allow TDCJ and the Texas Governor office and the Attorney General offices to allow Slavery in prison

is to brake the Laws. of the Constitution LAW. And the amendment
Case 4:16-cv-01333 Document 1 Filed in TXSD on 05/10/16 Page 4 of 6
LAW. as well is the TEXAS BOARD of Pordle. who ~~has~~ Prosecuted
The Case that TDCS worker write in mate for Not turn out for
Any Job that TDCS UCC Dept giving out to mens in prison
and the 11 Amendment. One should not be push for not work as A
SLAVE. Because their is not A 100 percent one is guilty of A CRIME
Just because one is in prison (see) micheal marton and many
other inmate across the USA. Amendment XIII Pass by Congress 1-31-
1865.

Neither SLAVERY NOR INVOLUNTARY SERVITUDE, EXCEPT AS A PUNISHMENT FOR
CRIMES WHEREOF THE PARTY SHALL HAVE BEEN DULY CONVICTED SHALL
EXIST WITHIN THE US. OR ANY PLACE SUBJECT TO THEIR JURISDICTION.
IN 1865 IT WAS THE NORM. TO SENTENCE A PERSON TO HARD LABOR. THERE WAS
NO CHANCE OF A RETRIAL. NOR WAS SLAVES LIKELY TO HAVE A SECOND CHANCE
TO JUSTICE. BUT IN THIS DAY AND TIME. THE NORM IS TO SENTENCE A PERSON
TO TIME IN PRISON. IN THIS DAY YOUR PUNISHMENT IS TO TAKE AWAY
YOUR FREEDOM. NOT TO MAKE YOU A SLAVE FOR TDCS SO THEY CAN
GET RICH ON YOUR LABOR AS THEY ARE DOING IN 2-12-16.

THE CONSTITUTION [STATE SLAVERY IN ALL OF ITS FORMS IS NOT PRO-
IN NO FORM. SO WHAT IS COMING TO PRISON WORKING FOR NOTHING NOT
EVEN COURTS COULD NO CHILD SERVANT. TDCS IS CHARGE WITH THESE CONSTITUTION
VIOLATION AMENDMENT VIOLATION.

- 14) THE PLAINTIFF HAS NO PLAIN, ADEQUATE OR COMPLETE REMEDY AT LAW TO
REDRESS THE WRONG DESCRIBED HEREIN PLAINTIFF HAS BEEN AND WILL
CONTINUE TO BEIRREPARABLY INJURED BY THE CONDUCT OF THE DEFENDANT
UNLESS THIS COURT GRANTS THE DECLARATORY AND INJUNCTIVE RELIEF
WHICH PLAINTIFF SEEKS. I Harry DON LANGS. HAS SOME GRATE FEAR FOR
MY LIFE DUE TO THIS LAW SUIT. EVEN FROM TDCS WORK THAT I DONT
KNOW. BUT I ASK THE COURTS. TO PUT ME IN FEDERAL HAND UNTIL
THIS LAW ~~SUIT~~ HAS BEEN SOLVED.

Wherefore, Plaintiff Respectfully Pray that this court enter ~~enter~~
Judgment granting Plaintiff's Safe and conservation

- [15] A declaration that the acts and omissions described herein
Violated Plaintiff right and all Prison Rights under the constitution and
Law of the United States
- [16] A Preliminary and Permanent injunction ordering defendants
[name defendant. Governor Greg Abbott. Attorney General. ~~Ken Paxton~~ Ken Paxton]
TDCJ Director Stephen William [State what it is you want the
Defendant to do or stop doing. Answer. I want the governor Attorney General
head of TDCJ step William To close all TDCJ company that has
Steve Lador. That they want hire free world people to work for
so we can do our time and want have to worry about getting
case are cases. That would make us have to be in TDCJ longer
are be the bigger man that in fromin slavery work on people who
are already down and some out.
- [17] Compensatory damages in the amount of ~~\$125,000,000~~, against
each defendant, Jointly And severally.
- [18] Punitive damage in amount of \$125,000,000 against each
defendant.
- [19] A Jury trial on all issues triable by Jury
- [20] Plaintiff costs in this suit
- [21] any additional Relief this court deem just

DATE _____
Respectfully Submitted

[I]

Prisoner's names And Address

Verification [S]

I have Read the foregoing Complaint And hereby verify that the matter alleged therein are true, except as to matter alleged on Information and belief, and as to thoes, I believe them to be true. I Certify under Penalty of Perjury that the foregoing is True and correct.

executed at [City Livingston AND state Texas]
on DATE 5-4-14

Signature = Larry Don Lang # 1688906

Type Name of Plaintiff